



## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Land East of Tilletts Lane Warnham
<b>DESCRIPTION:</b>	Erection of 59 dwellings with associated open space, landscaping, parking, access, and drainage infrastructure.
<b>REFERENCE:</b>	DC/25/1155
<b>RECOMMENDATION:</b>	Holding objection / Modification / More Information

### SUMMARY OF COMMENTS & RECOMMENDATION:

While some positive changes have been made to address landscape concerns highlighted within pre-application advice, there remains several issues that are discussed in detail below. Further consideration of the layout, particularly within the northeastern parcel of the site, needs to be given in order to successfully mitigate identified residual adverse landscape and visual effects.

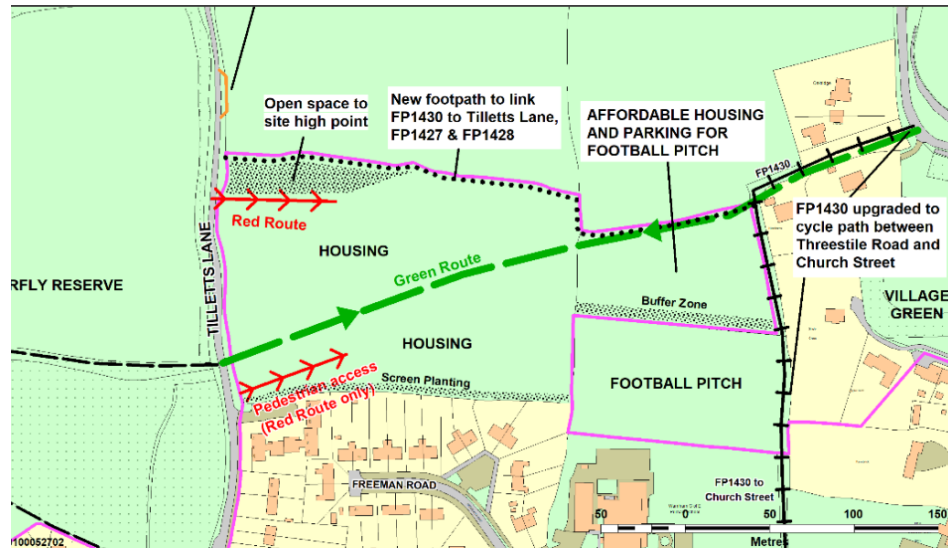
### MAIN COMMENTS:

#### LVA & Layout

1. The LVA provided has been reviewed following the Landscape Institute's Technical Guidance Note (2020). The majority of conclusions are concurred with, however there are some judgements disputed including the approach to mitigation and subsequent residual effects.
2. The submitted assessment of effects on the site's vegetation indicates that the magnitude of change would be medium beneficial due to the *site's 'protection of existing trees and boundary vegetation combined with extensive planting, landscape and ecological improvements'*. We disagree with this judgement based on the fact that the current layout poses a risk to some of the existing vegetation and its loss or undermining would have a significant effect on this receptor and landscape character of the area overall. The relationship of the veteran tree T59 with plots 58 and 59 if retained as proposed is highly likely to be subject to post development pressure to fell or heavily prune the tree which would be hard to resist. Other issues with planting within RPA's (particularly veteran trees within the western boundary) have also been identified but these could be resolved through repositioning and/or variation within the planting spec. While the susceptibility is judged as low based on *'development need not significantly effect the boundary vegetation'* this is not currently demonstrated and considered an avoidable major loss of an existing landscape element which is key to landscape character. For those reasons we judge the effects of the proposed development on the vegetation receptor as being Major adverse.
3. Mitigation planting is referenced within the report as tree, shrub and hedgerow planting as well as some boundary planting, however, as discussed in more detail further down in the

report, there is overreliance in measures, such as planting inside private gardens, which are not, in the long term, covered by planning control and therefore we cannot conclude that the mitigation is appropriate and would successfully mitigate the adverse effects of the proposed development.

4. It is also unclear how the proposals have been influenced by the findings of the LVA. Of key concern is the portion of land along the northern boundary at the site's highest point, which the Warnham Neighbourhood Plan (Policy W6, Figure 5.3) highlighted as being open space. Figure 21 of the assessment clearly indicates 'areas suggested to stay undeveloped', however this is not reflected within the layout.



5. Further, it is demonstrated through Viewpoint 3 (appendix 2: visualisations) that housing in this location would give rise to a medium/high adverse magnitude of change and a Major/Moderate adverse effect, as opposed to the 'moderate adverse' identified in the submitted LVA. This identified effect would remain as such at Year 15 as the existing boundary vegetation, along the northern boundary, is to remain as with only grassland.
6. It is therefore our judgement that planting alone is not sufficient to successfully reduce adverse landscape and visual effects and that modification to the layout must be considered in addition.
7. In order to mitigate adverse effects on landscape character and visual amenity, and to comply with HDPF Policies 25, 26, 31 and 33 (6), in addition to new planting, existing vegetation including mature trees must be protected, conserved and enhanced. The proposed layout must therefore avoid development within root protection areas (RPAs), demonstrate compliance with BS 5837:2012 5.3.1 and consider its relationship with these existing features.
8. As above, concern is raised regarding the proposed relationship between veteran tree T58 and plots 58 and 59. The proximity of these plots poses a risk to the long-term retention and appropriate setting of the tree. To safeguard its longevity and positive contribution this parcel and landscape corridor provides to the rural setting of the conservation area (as indicated in the Landscape fringe 3 of the Warnham Conservation Area Appraisal and Management Plan), it is recommended that plots 58 and 59 are removed from the layout.
9. In addition, see point 15 below with regards tree planting along the western boundary.
10. We query the positioning and movement strategy of the 2 clusters of trees within the road layout which preclude permeability through the site. We recommend these are removed from the layout.

#### Soft Landscape

11. Street trees are particularly lacking within the southern access road. The street tree

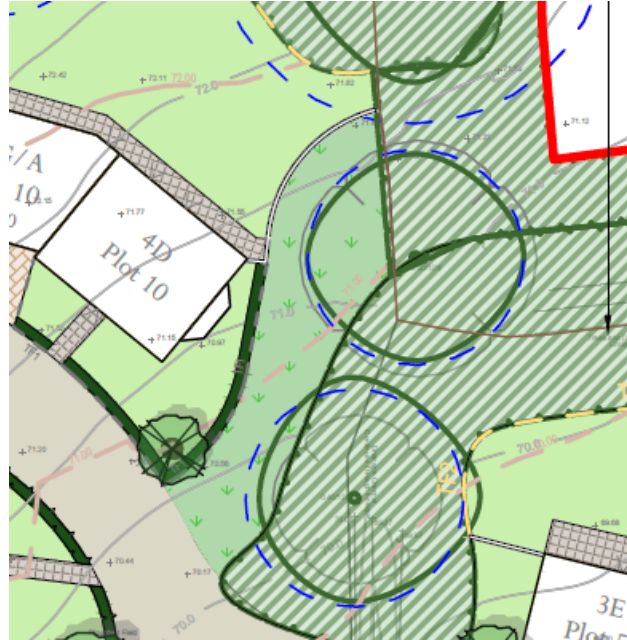
planting strategy overall needs reviewing as many trees are within private gardens and their retention will be difficult to control. Due to the relationship with the proposed dwelling, the trees shown in the extract below would be highly likely to be removed by a future occupier.



12. Woodland shrub mix should include larger specimens indicated in plan, as per the specification, *'Feathered hedging stock planted on 1m staggered grid spacings with occasional trees where shown'*. Please indicate location of the 'occasional trees' proposed within the area to the south of basin 2 as well as the pump house.
13. Further, the native mix is now partially removed (Landscape Masterplan Rev P09) to address LLFA request to a 3m easement. Please note this should not be addressed at the expense of the mitigation measures identified within the LVA (see viewpoint 5 where the maturing of the buffer planting is relied on to reduce the identified major/moderate adverse effect) and the requirements of WNP policy W6. The layout must therefore be reviewed. Any changes to the planting scheme, will need to be coordinated and also updated within the planting plans, planting schedules, BNG proposals, etc
14. The softening of the scheme within the parcels as well as within the boundaries is a key mitigation strategy, crucial to the integration of the proposals into the landscape given the position of the site within the slope and long and medium distance views available.
15. As a general rule, tree planting should occur outside of RPAs. However, where unavoidable due to other conflicting objectives such as boundary enhancement, the encroachment should be detailed within the Tree Protection Plan and girth size of proposed trees adjusted to minimise disturbance to the existing trees. Hand digging must also be identified within the specification. In addition, trees should not be proposed where demonstrating conflict with overhead powerlines. As a result, the tree planting layout alongside the western boundary may need to be reviewed.
16. Clarity is requested in regard to areas of retained scrub and retained grassland, which appear to be detailed as the same hatch and shown as retained in some plans and removed in others. Please amend to clearly distinguish the two and update the legend accordingly. Please see point 25 regarding the maintenance strips in addition.
17. Attenuation basins and swales should blend aesthetically into the surroundings and be planted and combined with variations in vegetation structure to ensure habitat diversity and landscape effect. We expect to see this reflected in plan and planting schedule and their specific maintenance within the LMMP. Please review planting proposals accordingly.
18. As above, low level planting was originally proposed within the swales within the Landscape Strategy Plan as part of the Public Exhibition, but is currently proposed as

wildflower meadow. It is unlikely that wildflower meadow will successfully establish or be managed in this location, therefore we request that SuDS appropriate planting is proposed instead.

19. Similarly, wildflower meadow is not appropriate in the narrow strip abutting Plot 10, below. As per our pre-application advice, we expect a greater provision of tree, hedgerow and buffer planting to reflect the rural character and to offer amenity value. We recommend this area is enhanced with woodland planting instead.



20. We request that *Lonicera nitida* is replaced with alternative species such as those in the planting palette or *Taxus baccata*, for biodiversity and amenity value.
21. As noted within the LEMP, *Crocsmia/Montbretia* is listed on Schedule 9 of the Wildlife and Countryside Act in England and Wales, and thus should not be included within proposals. Please remove and consider an alternative suited to rain garden conditions, such as *Veronicastrum virginicum* or *Aquilegia canadensis*.
22. We advise against *Mentha spicata* for the sensory mix, given its tendency to spread and outcompete other species. Please consider an alternative species or include measures to restrict growth.
23. We recommend that Hornbeam is proposed for clipped hedging, as opposed to Beech, which is not as suited to the clay soil conditions.
24. Please clarify if the Herb Mix table is additional to the Herbaceous table within the planting schedule as this seems duplicated.

#### Hard Landscape

25. As per pre-application advice, a maintenance strip is required between the garden boundaries and existing landscape features. Please detail this in plan and amend the fencing in the southern border to include a maintenance access gate.
26. While a slab levels plan has been provided and indicative contours within the landscape masterplan, a levels and earthworks plan is required for all external areas to fully understand the proposed changes to the existing landform. Given the site positioning on a slope and proposed slab levels, the forming of platforms may be required in some instances, particularly within the southern parcels. Further, it is unclear if these proposed earthworks would have a negative impact on the existing boundary by encroaching into the root protection areas.
27. Please change the slab paving underneath benches across the scheme to resin bound

gravel, as its appearance is deemed incongruous with the landscape setting.



28. HDC requires any timber equipment to be installed with steel footings to prolong their longevity and avoid rotting, including play equipment. Please update specification accordingly.
29. Please update the boundary plan to reflect treatments of the northernmost properties as well as treatments between gardens.
30. Wildlife enhancements noted within the LEMP should be indicated within plan, particularly the Boundary Plan in regard to Hedgehog fence holes.

#### Open Space & Play

31. Plans must demonstrate compliance with the OSSR. We note within the Planning Statement that 5202m<sup>2</sup> is proposed for Parks and Gardens, Amenity Greenspace and Natural Greenspace and 569m<sup>2</sup> is proposed for Children and Young People. This is welcomed, however these figures must indicate the split between the 3 typologies of multi-functional green space and how these meet the OSSR requirements.
32. As per pre-application advice, we request a land budget plan that establishes the areas identified for each typology, and that demonstrates the open space strategy with sizes, buffer zones (at least 20m between the play space and edge of the boundary of the nearest dwelling for the LEAP and 5m for the LAP) and walking distances from dwellings. As result, the location of the LAP may need to be adjusted.
33. Given the identified deficit of Natural Greenspace within Warnham, a higher proportion of that typology is expected and may be achievable through the suggested layout amendments outlined throughout this response.
34. Please note that the LAP and LEAP areas will not be counted towards the quantity standard of the multifunctional greenspace, and SuDS schemes will not be counted towards the quantity standard of amenity greenspace.
35. It is recommended that the LAP is relocated closer to proposed dwellings to benefit from informal surveillance but also to be positioned outside the veteran trees buffer zones. In addition, an all-weather footpath accessible to people with disabilities must be provided.
36. Please include litter and dog bins at key access points as well as signage to encourage control of dogs and discourage dog fouling, as per OSSR requirements.
37. A minimum of five items of play are required for the LEAP and should include features to encourage inclusive play and accessible to people with disabilities over as much of the site as is reasonably possible. Natural features including sensory planting and landform must be designed into scheme to create a considered and stimulating play space.
38. Given fencing is being proposed around the LEAP, the provision of a wider gate to allow for maintenance vehicles must also be indicated.
39. Please include a welcome sign for both play areas. As per the OSSRR, signage should welcome the user, name the site, indicate constraints on use, provide contact details of the managing agent, and discourage dogs. Ideally it should also provide a QR code to invite feedback and report issues.
40. Cycle parking provision is also required.



41. A detailed design layout for both play areas, including play equipment details, surfacing, landform, planting, etc, as detailed above, must be submitted.

#### Drainage & Utilities

42. While the coordinated utilities plan is welcomed, we request the locations of rainwater harvesting tanks for completeness and to ensure no potential conflicts with the landscape strategy.
43. We note that the permeable treatment as proposed within the Hard Landscaping Plan does not fully coordinate with the Drainage Strategy, the former indicating a larger surface area. Please ensure these plans are amended for consistency.
44. Please remove '*application of glyphosate-based weed killers*' from Table 5.1. See point 45 for more information.
45. We recommend blue green roofs are introduced to ancillary structures such as bin and cycle stores. If proposed, we expect to see details within a plant schedule and specific maintenance within the LMMP.
46. We request that the locations of tree root barriers be added to plan where needed.
47. The ground contouring, inlet and outlet design should be carefully considered to maximise the amenity value. We recommend a soft, naturalistic approach to headwalls, by introducing planting and cladding in Horsham stone, for example.

#### Specification & LEMP

48. We strongly recommend that chemical fertilisers, pesticides and herbicides including glyphosate are not to be applied at any time due to impacts on existing and proposed ecological features. Alternative methods for weeding should be considered such as hot foam or hot water systems, steel brushing in combination with acetic acid spraying, or electronic control systems. Please refer to [pan-uk.org](http://pan-uk.org) for guidance and [resources](#). Please amend accordingly to remove mention of herbicides and reflect alternative methods as above or hand weeding alone by careful digging or selective scything:
- a. Landscape Specification: 168.3, 210, 221.1, 300, 421.1, 620.7 & 910.1.
  - b. LEMP: 3.1.14, 7.1.2.8, 7.2.2.7, Appendix A & Appendix B.
49. Please amend the Landscape Specification and LEMP to reflect that a 120mm collar should be left free of mulch to prevent the stem/trunk from rotting.
50. Specific measures are required to ensure the successful establishment of wildflower meadows, particularly given the ex-arable nature of the Site. Please include detailed specification on the creation of wildflower meadows within the Landscape Specification. Maintenance operations must also be included within the LEMP.
51. Furthermore, the LEMP makes reference to using Emorsgate EM8 Meadow Mixture, as opposed to the 100% wildflower EM8F as listed within the planting schedule. Please ensure consistency between documents, as the creation and management methods differ depending on the seed mix proposed.
52. Please provide information on watering regimes for successful establishment within the LEMP, as 'as required' is not sufficient detail.
53. As per the BNG Assessment, a Habitat Management and Monitoring Plan (HMMP) will need to be produced. Therefore, the LEMP may need to be updated to ensure consistency with any ecological objectives.

**RECOMMENDED CONDITIONS:** N/A

**NAME:**

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<b>DEPARTMENT:</b>	Specialists Team - Strategic Planning
<b>DATE:</b>	03/10/2025
<b>SIGNED OFF BY:</b>	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
<b>DATE:</b>	23/10/2025